

William B. Curtis, *admitted pro hac vice*  
Texas SBN: 00783918  
**CURTIS LAW GROUP**  
12225 Greenville Ave.  
Suite 750  
Dallas, TX 75243  
T: (214) 890-1000  
F: (214) 890-1010  
Email: [bcurtis@curtis-lawgroup.com](mailto:bcurtis@curtis-lawgroup.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**AMENDED MASTER SHORT FORM  
COMPLAINT FOR DAMAGES FOR  
INDIVIDUAL CLAIMS AND DEMAND  
FOR JURY TRIAL**

Plaintiff(s) named below, for their Amended Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.364). Plaintiff(s) further show the Court as follows:

**1. Plaintiff/Deceased Party:**

Tamara Holcomb

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

n/a

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

n/a

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2     4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
3         the time of implant:

4             Florida  
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5     5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
6         the time of injury:

7             Florida  
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8     6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

9             Florida  
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10    7. District Court and Division in which venue would be proper absent direct filing:

11             USDC for the District of New Jersey, USDC for the District of Florida.

12    8. Defendants (check Defendants against whom Complaint is made):

13              C.R. Bard Inc.  
14

14              Bard Peripheral Vascular, Inc.  
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15    9. Basis of Jurisdiction:

16              Diversity of Citizenship  
17

17              Other: \_\_\_\_\_  
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18    a. Other allegations of jurisdiction and venue not expressed in Master  
19         Complaint:  
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10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

- Recovery® Vena Cava Filter
- G2® Vena Cava Filter
- G2® Express Vena Cava Filter
- G2® X Vena Cava Filter
- Eclipse® Vena Cava Filter
- Meridian® Vena Cava Filter
- Denali® Vena Cava Filter
- Other:

11. Date of Implantation as to each product:

February 26, 2014

**12. Counts in the Master Complaint brought by Plaintiff(s):**

- Count I: Strict Products Liability – Manufacturing Defect
- Count II: Strict Products Liability – Information Defect (Failure to Warn)
- Count III: Strict Products Liability – Design Defect
- Count IV: Negligence - Design
- Count V: Negligence - Manufacture
- Count VI: Negligence – Failure to Recall/Retrofit
- Count VII: Negligence – Failure to Warn
- Count VIII: Negligent Misrepresentation
- Count IX: Negligence *Per Se*

- Count X: Breach of Express Warranty
- Count XI: Breach of Implied Warranty
- Count XII: Fraudulent Misrepresentation
- Count XIII: Fraudulent Concealment
- Count XIV: Violations of Applicable Florida Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
- Count XV: Loss of Consortium
- Count XVI: Wrongful Death
- Count XVII: Survival
- Punitive Damages

Other(s): \_\_\_\_\_ (please state the facts supporting this  
Count in the space immediately below)

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Jury Trial demanded for all issues so triable?

Yes  
 No

1  
2 RESPECTFULLY SUBMITTED on this 31<sup>th</sup> day of May, 2019.

3 **CURTIS LAW GROUP**

4 By: /s/ William B. Curtis

5 William B. Curtis, *admitted pro hac vice*  
(TX SBN: 00783918)  
6 12225 Greenville Ave., Suite 750  
Dallas, TX 75243  
7 T: (214) 890-1000  
F: (214) 890-1010  
8 Email: [bcurtis@curtis-lawgroup.com](mailto:bcurtis@curtis-lawgroup.com)  
*Attorney for Plaintiff*

9  
10 I hereby certify that on this 31<sup>th</sup> day of May, 2019, I electronically transmitted the  
11 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal  
12 of a Notice of Electronic Filing.

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14  
15 /s/ William B. Curtis

16 William B. Curtis  
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